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March 14, 2024

**Via ECF**

Hon. Margaret M. Garnett  
U.S. District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Timothy Jackson v. Valnet, Inc.*  
Docket No: 1:24-cv-00128-MMG

Dear Judge Garnett:

We are the attorneys for Plaintiff Timothy Jackson ("Plaintiff") in this matter. Pursuant to Section I(B)(5) of Your Honor's Individual Rules and Practices, we write to respectfully request an adjournment of the initial conference date until at least twenty-one (21) days after Defendant Valnet, Inc. ("Defendant")'s deadline for responding to the Complaint. The adjournment would permit the parties to competently discuss the required topics under Rule 26(f) and the most appropriate case management plan based on Defendant's response to the Complaint. Further, the additional time will help conserve resources which will facilitate the parties' settlement discussions.

Defendant executed a waiver of service on January 12, 2024, setting April 11, 2024 as Defendant's deadline to answer the Complaint (ECF No. 9). Pursuant to ECF No. 8, an initial conference is currently set for March 22, 2024. Defendant consents to this request and no adjournments or extensions were previously sought.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

*/s/ Renee J. Aragona*

cc: Lindsay R. Edelstein, Esq.  
Mitchell Silberberg & Knupp LLP  
*Via email to lre@msk.com*  
*Counsel for Defendant*

**GRANTED.** The Initial Pretrial Conference previously scheduled for March 22, 2024 is hereby adjourned to **Thursday, May 16, 2024 at 9:30a.m.** The conference will be held before Judge Garnett in Courtroom 906 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007. The parties' joint letter and proposed Case Management Plan are due **May 9, 2024.**

**SO ORDERED.** Dated March 14, 2024.

A handwritten signature in black ink, appearing to read "Margaret M. Garnett".

**HON. MARGARET M. GARNETT**  
**UNITED STATES DISTRICT JUDGE**